

STATE OF SOUTH DAKOTA)
COUNTY OF LINCOLN)
:SS

IN CIRCUIT COURT
SECOND JUDICIAL COURT

State of South Dakota,

CRI. 19- 90

Plaintiff,

vs.

Son Van Ho

Monterey Park, CA 91754

Defendant.

Complaint for

- Ct. 1: Possession of Controlled Drug or Substance, SDCL 22-42-5
- Ct. 2: Identity Theft, SDCL 22-40-8(1)
- Ct. 3: Identity Theft, SDCL 22-40-8(2)
- Ct. 4: Use of Scanning Device on Payment Card - Intent, SDCL 22-40-12
- Ct. 5: Possession of Scanning Device W/ Intent to Defraud, SDCL 22-40-14
- Ct. 6: Displaying Another's Id Card, SDCL 32-12-17.5
- Ct. 7: Possession of Drug Paraphernalia, SDCL 22-42A-3

The undersigned being duly sworn upon oath charges:

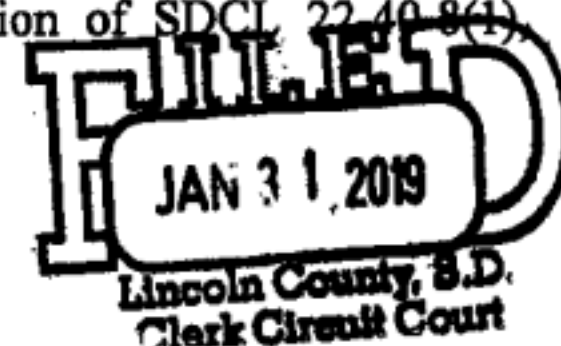
That on or about the 30th day of January, 2019, in the County of Lincoln, State of South Dakota, Son Van Ho, did commit the public offense of:

Count 1.

POSSESSION OF CONTROLLED DRUG OR SUBSTANCE (SDCL 22-42-5) in that he did knowingly possess a controlled drug or substance, to-wit: Son Van Ho did knowingly possess Methamphetamine, a schedule II controlled drug or substance, in violation of SDCL 22-42-5, (Cl. 5 felony);

Count 2.

IDENTITY THEFT (SDCL 22-40-8(1)) in that he did, without the authorization or permission of another person and with the intent to deceive or defraud, obtain, possess, transfer, use, attempt to obtain, or record identifying information not lawfully issued for that person's use, to-wit: Son Van Ho did, without the authorization or permission of [REDACTED] and with the intent to deceive or defraud, obtain, possess, transfer, use, attempt to obtain, or record identifying information not lawfully issued for Son Van Ho's use, in violation of SDCL 22-40-8(1), (Cl. 6 Felony);



Count 3.

IDENTITY THEFT (SDCL 22-40-8(2)) in that he did, without the authorization or permission of another person and with the intent to deceive or defraud, access or attempt to access the financial resources of that person through the use of identifying information, to-wit: Son Van Ho did, without the authorization or permission of [REDACTED] and with the intent to deceive or defraud, access or attempt to access the financial resources of [REDACTED] through the use of identifying information, in violation of SDCL 22-40-8(2), (Cl. 6 Felony);

Count 4.

USE OF SCANNING DEVICE ON PAYMENT CARD - INTENT (SDCL 22-40-12) in that he did use a scanning device to access, read, obtain, memorize, or store, temporarily or permanently, information encoded on the magnetic strip or stripe of a payment card with the intent to defraud, (Cl. 6 felony.);

Count 5.

POSSESSION OF SCANNING DEVICE W/ INTENT TO DEFRAUD (SDCL 22-40-14) in that he did own or possess a scanning device or a reencoder with the intent to use such scanning device or reencoder to defraud, (Cl. 1 misd.);

Count 6.


DISPLAYING ANOTHER'S ID CARD (SDCL 32-12-17.5) in that he did display or represent as one's own any nondriver identification card not issued to him, to-wit: Son Van Ho did display or represent as his own any nondriver identification card not issued to him, in violation of SDCL 32-12-17.5, (Cl. 1 misd.);

Count 7.


POSSESSION OF DRUG PARAPHERNALIA (SDCL 22-42A-3) in that he did, knowing the drug related nature of the object, use or possess with intent to use, drug paraphernalia to plant, propagate, cultivate, grow, harvest, manufacture, compound, convert, produce, process, prepare, test, analyze, pack, repack, store, contain, conceal, inject, ingest, inhale, or otherwise introduce into the human body any controlled substance or marijuana, in violation of SDCL 22-42A-3, (Cl. 2 misd.);

contrary to the statute in such case, made and provided against the peace and dignity of the State of South Dakota.

Dated this 31st day of January, 2019.


Prosecuting Attorney

Subscribed and sworn to before me this 31st day of January, 2019.


Notary Public - South Dakota
My Commission Expires: 2-13-2020
